564 Q. **HAS NICOR PROVIDED ANY EVIDENCE THAT NOMINATIONS BY**
565 **TRANSPORTATION CUSTOMERS OBSTRUCT NICOR'S GOAL OF**
566 **CYCLING ITS STORAGE FIELDS?**

567 A. No. As in the 2004 Rate Case, Nicor has not demonstrated that nominations by
568 Transportation customers obstruct Nicor's goal of cycling its storage fields so as
569 to warrant decreased flexibility. In the 2004 Rate Case, the Commission rejected
570 Nicor's proposed modifications to the Maximum Daily Nominations of
571 Transportation customers because Nicor provided no analysis that "demonstrates
572 Transportation customers intentionally interfere with Nicor's efforts to cycle its
573 storage fields or that the activities of Transportation customers have ever actually
574 interfered with Nicor's efforts to cycle its storage fields." *2004 Nicor Rate Case*
575 *Order* at 131. In the current Rate Case, Nicor has similarly provided no data that
576 shows that modifications to the Maximum Daily Nominations are required for
577 Nicor to cycle its storage fields.
578

579 Q. **IN HIS TESTIMONY, MR. BARTLETT SUGGESTS THAT ECONOMIC**
580 **DECISIONS BY THIRD-PARTY STORAGE CUSTOMERS CAN IMPACT**
581 **NICOR'S PLANS TO FILL AND EMPTY ITS STORAGE FIELDS.**
582 **(NICOR GAS EX. 4.0, LINES 423-435.) PLEASE COMMENT.**

583 A. While Mr. Bartlett contends that economic decisions by transportation customers
584 are an example of something that may impact injections into storage, Mr. Bartlett
585 does not offer any evidence showing that economic decisions by third-party

586 customers actually do impact storage injections, or that Nicor has been harmed
587 when, and if, this has occurred.
588
589 **Q. DOES NICOR OFFER ANY DATA IN SUPPORT OF THIS**
590 **CONTENTION?**
591 A. Not in its direct case. It is a claim unsupported by any evidence.
592
593 **Q. BESIDES CIRCUMVENTING THE COMMISSION'S DECISION TO**
594 **REJECT AN APRIL 1 CYCLING TARGET OF 10%, ARE THERE**
595 **OTHER PROBLEMS WITH NICOR'S TWO PROPOSALS?**
596 A. Yes. Nicor proposes to revise the Maximum Daily Nomination ("MDN")
597 methodology and change the March and April daily nomination limits. Currently
598 a customer can inject its MDN during each month from April through October.
599 The MDN is determined by adding the customer's historical usage for that month
600 plus 25% of the customer's storage capacity. The resulting volume is divided by
601 the number of days in the month to determine the daily limit. (Nicor Gas Ex. 4.0,
602 lines 507-512.) Historical usage for the comparable month in a prior year is
603 known well in advance of the current month. Likewise, Nicor's tariff currently
604 require that by March 1 of each year Nicor informs its customers of their SBS
605 capacity for the upcoming June 1 through May 31 of the next year. (Nicor Gas
606 Company, Ill.C.C. No. 16-Gas, Sheet No. 50.1.) Thus, under the current
607 methodology, the MDN is known by the customer well in advance of when it is in

effect. Thus, a transportation customer can plan for the entire injection season in order to meet the 90% storage requirement for November 1.

Under the proposed methodology, not only does the method for determining injection vary by month, but there is also a greater lag and uncertainty in determining what the actual injection rights will be for any given month.

Q. CAN YOU PROVIDE FURTHER EXPLANATION OF THE DIFFERENCES?

A. The differences are illustrated in CNE-Gas Exhibit 1.7.

Q. WAS CNE-GAS EXHIBIT 1.7 PREPARED UNDER YOUR DIRECTION?

A. Yes.

Q. WHAT DOES CNE-GAS EXHIBIT 1.7 REPRESENT?

A. CNE-Gas Ex. 1.7 compares current daily injection limits as approved in the 2004 rate case with the revised limits Nicor now proposes.

Under the existing tariff, a transportation customer manages its injections using one of two different daily injection methodologies: one for November through March and a second, more restrictive system, for April through October. Nicor now proposes to revise this straightforward system by imposing five daily injection methodologies throughout the year. (Nicor Gas Ex. 4.0, line 556.)

631 Amazingly, Nicor claims it, at least in part, has done so in order to "to keep the
632 process simple." Overlaying an additional three injection methodologies that will
633 vary by month hardly simplifies the process for transportation customers. Not
634 only do transportation customers need to keep track of what method applies at
635 various points in the year, for certain months there will be less advance certainty
636 as to the transportation customer's actual injection rights making it difficult to
637 plan their summer injections.
638
639 **Q. WHAT DO YOU MEAN BY LESS ADVANCE CERTAINTY?**
640 A. Nicor acknowledges that the reason it did not propose the same methodology for
641 May and June as that proposed for July through October is due to Nicor's own
642 data lag. Nicor recognizes that, as timely daily meter reads are unavailable, it is
643 impossible for a customer to know its SBS "inventory balance at April 30 until
644 well into May." (Nicor Gas Ex. 4.0, lines 549-551.) While the practical
645 implication for Nicor is that it cannot quickly know the inventory balance, the
646 ramification of this situation for the end use customer is even greater. As a result
647 of Nicor's data lag, customers must make injection or withdrawal decisions
648 without accurate information, instead relying upon their best guess as to their
649 actual inventory. Thus, when approaching the key April 30 date in Nicor's
650 proposal, the transportation customer may be relying upon its own inventory
651 estimate, not actual storage data. Consequently, it is impossible for a
652 transportation customer to manage its SBS account with precision.
653

While data lag is already a challenge under the current tariffs, that challenge is greatly magnified under Nicor's proposal to have April 30 inventory determine future injection rights. The situation is further complicated by that fact that Nicor also proposes to place greater restrictions on March and April injections, the period that leads up to the April 30 storage inventory evaluation date.

Q. MR. BARTLETT STATES THAT THE "PROPOSAL TO CHANGE THE MDN CALCULATION IS EXPECTED TO HELP REDUCE THE POTENTIAL NEED FOR NICOR GAS TO 'CAP' PIPELINE DELIVERIES FOR THOSE DAYS DURING THE INJECTION SEASON ON WHICH TOO MUCH GAS IS BEING NOMINATED TO NICOR GAS' SYSTEM RELATIVE TO THE LEVEL OF INJECTIONS WHICH CAN BE PHYSICALLY ACCOMMODATED BY THE STORAGE FIELDS." (NICOR GAS EX. 4.0, LINES 534-545.) NICOR'S PROPOSAL TO LIMIT DAILY NOMINATIONS IN MARCH AND APRIL "ALSO IS EXPECTED TO REDUCE THE POTENTIAL NEED FOR PIPELINE CAPS." (NICOR GAS EX. 4.0, LINES 617-619.) DO YOU HAVE ANY COMMENT?

A. Yes. Nicor proposes to introduce a complicated new formula for calculating MDN from July through October. Nicor's response to DAS 1.01, attached as CNE-Gas Ex 1.8, shows that from 2004 through 2007, there were 139 days of Nicor pipeline "caps." Only four of these days occurred during the July-October period. During this four year period, over two-thirds of the "caps" that occurred took place during months for which Nicor has proposed *no change* to injection

677 limits in this proceeding (i.e., November through February and March and April).
678 Thus, based on historical trends, Nicor's proposed change to the MDN calculation
679 will have no impact on the overwhelming majority of pipeline "caps." Further,
680 Nicor concedes that these proposals will not eliminate the need to issue "caps."
681 (Nicor Gas Ex. 4.0, lines 542-545, 625-629.)
682
683 **Q. WHAT ARE THE VOLUMETRIC DIFFERENCES BETWEEN THE**
684 **CURRENT AND PROPOSED INJECTION LIMITS?**
685 A. During the period of November through February, and again in May and June, the
686 limits are the same. However, during each of the remaining months injection
687 rights are less than under the current tariff.
688
689 **Q. HOW CAN THE INJECTION LIMIT PROPOSED BE LOWER IF A**
690 **TRANSPORTATION CUSTOMER IS CYCLING ITS STORAGE?**
691 A. First, March and April do not depend upon any cycling of gas. March injection
692 rights are currently two times the customer's Maximum Daily Contract Quantity
693 ("MDCQ"). Obviously, the proposal to limit injection rights to 150% of historical
694 March usage will result in lower injection rights than 200% of maximum use. In
695 April a customer is currently entitled to its April historical usage plus roughly 7
696 days of its MDCQ (25% of a 28-day SBS account). Nicor's current proposal
697 offers April historical usage plus 10% without regard to the customer's storage
698 bank. Nicor's proposal will result in reduced rejection rights for April since

699 maximum daily use ("MDCQ") is likely higher than average April daily use and
700 there is no accounting for the benefit of storage under Nicor's proposal.
701
702 In looking at the data Nicor provided in response to DAS 1.13, Nicor's data
703 indicates March injection limits would be reduced by 66% to 71% under its
704 proposal. April injection limits would be reduced by 39% to 42%. For a
705 customer using natural gas primarily for heating, the impact is even greater. For
706 example, in looking at the impact of Nicor's proposal on several schools, I found
707 March injection rights decreased by 74% to 83%, while April's injection rights
708 were 50% to 75% lower.
709
710 Based on Nicor's testimony, even if a transportation customer cycles its gas so
711 that its storage account is only 10% filled at the end of April, it will experience
712 lower injection rights under Nicor's proposal for July through October than it
713 currently receives. Nicor's response to DAS 1.12 indicates the degree to which
714 injection rights could decrease under the proposed changes. Based on recent
715 history, DAS 1.12 indicates that Nicor's proposal will reduce the customer's
716 injection rights for July through October by 16% to 31%, even if the customer
717 cycles to 10% by the end of April.
718
719 **Q. WHY DO YOU BELIEVE THAT ADOPTING NICOR'S PROPOSED**
720 **INJECTION LIMITS WILL REDUCE A TRANSPORTATION**

CUSTOMER'S INJECTION ABILITY EVEN IF THE CUSTOMER CYCLES TO 10% BY THE END OF APRIL?

A. Both the current tariffs and Nicor's proposal start with the comparable month historical usage so there is no difference between the two methods in this regard. Under either plan, customers begin with the same volume. However, the second part of the equation – the current "25% of the SBS capacity" or the proposed "25% of the difference between SBS capacity minus April 30 SBS inventory,"—necessitates reduction in daily injection limits under Nicor's proposal. CNE-Gas Exhibit 1.9 provides an illustration of this point.

Q. WAS CNE-GAS EXHIBIT 1.9 PREPARED UNDER YOUR DIRECTION?

A. Yes.

Q. WHAT DOES CNE-GAS EXHIBIT 1.9 SHOW?

A. Under Nicor's proposal, it is only when storage is completely emptied that the daily injection rights under the proposed plan equal those that currently exist. In this example, the current 250 SBS capacity equals the 250 SBS capacity of the proposal when inventory is at 0 on April 30. As it is virtually impossible to have a SBS inventory of zero, daily injection rights under the proposal are lower than what is currently in place. Even if a customer cycled to the 10% target level proposed in Nicor's last rate case, the transportation customer would experience lower injection rights than current tariffs provide. The precision of having an inventory balance of exactly zero in storage is not only virtually impossible due to

the data lag discussed earlier, but it is also virtually impossible due to the fact that current tariffs provide that when a storage balance drops below zero, Nicor will inject gas into that account. As such, it is unlikely that many, if any, transportation customers would be able to manage their inventory balance to such precision as to be exactly at zero on April 30.

Q. IS THE DATA LAG MR. BARTLETT DESCRIBES YOUR ONLY CONCERN REGARDING ACCURATE SBS INVENTORY BALANCE INFORMATION?

A. No. In order to determine a storage inventory balance, you must account for customer injections and withdrawals from that storage. Injections and withdrawals from storage are dependent upon the customer's imbalance – in other words the difference between what was delivered on behalf of the customer and the customer's actual usage. Suppliers may purchase daily read data on customer usage from Nicor. Updates of recent activity are available to the supplier three times each week, on Tuesday, Thursday and Friday. Thus, if April 30 were to fall on a Friday, the supplier would not be able to access recent usage data to assess the impact on SBS balances until the following Tuesday, making it difficult to manage balances with precision. However, in addition to only providing updates three times a week, it is CNE-Gas' experience that the usage information that Nicor provides to suppliers is less than reliable.

Q. WHAT DO YOU MEAN WHEN YOU SAY THE USAGE DATA IS UNRELIABLE?

A. When accessing the files that contain the daily read data, it is my understanding that it is not uncommon for customer usage data to be missing from the file, or for even an entire day's worth of information on a customer group to be missing. In addition, certain customer's will show usage values that are many multiples higher than their actual usage. Some of these errors are corrected on subsequent downloads of the files; however, there are instances when receipt of current usage data from Nicor is delayed by more than a week.

Q. WHAT IS THE IMPACT OF THE ERRORS IN CUSTOMER USAGE DATA THAT NICOR PROVIDES?

A. The longer it takes Nicor to provide accurate data on customer usage, the more costly it is to our business. Inaccurate data also adds to our administrative costs as we must process the same data a second time. Second, in the event that Nicor fails to provide accurate usage data, the more difficult it is for a customer to manage its balances.

Q. WHY DO YOU SAY THAT THE LONGER IT TAKES TO OBTAIN ACCURATE DATA, THE MORE YOUR COSTS INCREASE?

A. Our nominations of future gas volumes are often based, in part, on recent customer usage patterns. Without recent histories, we are unable to base our nominations on the most recent consumption information for a facility. The less

accurate a nomination is, the greater the imbalance, which then potentially translates into higher costs due to additional cashout charges. Data lags and inaccuracy can further impact our ability to appropriately allocate our costs and correctly bill our customers. These problems make Nicor's proposals even more disconcerting to CNE-Gas as our customers could potentially see increased costs and less operational flexibility and we may not have accurate data in a timely manner to help manage these new requirements and minimize their impact.

VI. SUMMARY OF RECOMMENDATIONS

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS?

A. Certainly, I respectively request that:

1. The Commission approve storage withdrawal rights and a SWF consistent with its decisions in the 2004 Rate Case;
2. The Commission approve a SBS capacity allocation formula consistent with its decisions in the 2004 Rate Case;
3. The Commission approve a SBS charge that is consistent with the SBS entitlement calculations approved in this proceeding; and
4. The Commission rejects the storage injection limitations proposed by Nicor in this proceeding and instead retain existing requirements.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes.

CNE-Gas Exhibit 1.1
ICC Docket No. 08-0363

DARCY A. FABRIZIUS
Constellation Energy
N21 W23340 Ridgeview Parkway
Waukesha, Wisconsin 53187-2226
(262) 506-6631

EXPERIENCE

CONSTELLATION NEWENERGY, LLC **Waukesha, Wisconsin 1997-present**
Regulatory Affairs (1997-present)

- Responsible for monitoring regulatory activities in Wisconsin and Illinois and participation in proceedings as appropriate.
- Team facilitator of project team to develop Illinois Critical Day Management Plan.
- Prepared testimony and analysis regarding Alternative Retail Electric Supplier certification.

CONCORDIA UNIVERSITY **Mequon, Wisconsin 1996-2004**
Adjunct MBA Faculty - Marketing

- Developed first graduate level course in Direct Marketing for Concordia University.

AMERITECH **Milwaukee, Wisconsin 1985-1995**
Consumer Sales and Customer Service (1995)
- *Operations Management* • *Customer Support*

- Consolidated six consumer offices into a centralized location with 240 service representatives, handling over 3.4 million calls annually.

Business Marketing (1992 - 1994)
- *Product Management* • *Sales Support* • *Application Management*

Consumer Marketing (1985 - 1991)
- *Product Management* • *Sales Support* • *Channel Management*

UNITED STATES TESTING COMPANY, INC. **Wheeling, Illinois 1982-1984**
Consumer Market Research Division
- *Field Director* • *Project Director*

EDUCATION

Marquette University: Certificate in Computer Skills; Certificate in Webmaster Skills; Certificate in Management Skills **1995-1997**

University of Minnesota: Masters of Business Administration - Marketing **1979-1981**
Corporate Associates Fellowship

Gustavus Adolphus College: Bachelor of Arts - Psychology **1975-1979**
Magna Cum Laude

Northern Illinois Gas Company d/b/a Nicor Gas Company
Response to: Constellation NewEnergy – Gas Division, LLC
Ill.C.C. Docket No. 08-0363
CNE Second Set of Data Requests

CNE 2.01 Q. On page 29 of the direct testimony of Robert R. Mudra, Mr. Mudra identifies the .017 factor representing the daily proportion of peak day deliverability to cycled storage capacity from the 2004 rate case and states, based upon 2009 test year data, the factor should be updated to .018.

a. Please provide a description of the formula that is used to determine this factor.

b. Please identify and describe any differences between the formula as it is used in the instant proceeding compared to how it was used per the Commission's order in Docket No. 04-0779.

c. Please provide the 2009 test year data and calculations that were used to derive the .018 factor.

d. Please provide any workpapers supporting the calculations used to derive the .018 factor.

CNE 2.01 A. a. The critical day storage withdrawal limitation factor is equal to the amount of gas available from Company storage facilities on a peak day divided by the Storage Banking Service capacity allocation.

b. The formula is the same as used in Docket No. 04-0779.

c. Storage deliverability on a peak-day is 25,000,000 therms, divided by storage banking service allocation of (28 MDCQ days X 49,000,000 therms) = 1,372,000,000 therms is 0.0182 or rounded to 0.018.

d. No workpapers were developed or relied on for this calculation.

Witness: Robert R. Mudra

CNE-Gas Ex. 1.3. Storage Inventory Comparisons

	Maximum Working Gas Inventory Volume		Actual Maximum Working Gas Inventory 2000-2008	
	Test Year 2004	Test Year 2009	Volume	Month/Year
Troy Grove	48,000,000	40,247,000	47,560,488	Nov/2001
Ancona	60,900,000	58,855,000	63,056,085	Nov/2001
Mt. Simon	3,720,000	3,292,000	5,722,193	Nov/2001
Pecatonica	1,720,000	1,183,000	1,521,079	Jan/2005
Bloomington	8,400,000	7,874,000	9,007,751	Nov/2001
Hudson	10,250,000	8,555,000	12,187,316	Nov/2001
Lexington	8,250,000	6,742,000	9,012,081	Nov/2001
Galesville	8,500,000	7,885,000	8,608,047	Nov/2001
TOTAL	149,740,000	134,633,000	156,675,040	
Source	Section 285.6300 Schedule F-8	Section 285.6300 Schedule F-8	Nicor response to CNE 2.22	
Description	Maximum inventory level reached during field history	Maximum inventory targets for test year	Maximum working gas inventory	

Northern Illinois Gas Company d/b/a Nicor Gas Company
Response to: Constellation NewEnergy–Gas Division, LLC
Ill.C.C. Docket No. 08-0363
CNE Second Set of Data Requests

CNE 2.22 Q. What was the maximum working gas inventory for each of Nicor's on-system storage fields during 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007 and 2008? In each year, please state during which month the maximum inventory was reached.

CNE 2.22 A. See attached CNE 2.22 Exhibit 1.

SUPPLEMENTAL:

See footnote (1) on attached CNE 2.22 Exhibit 1.

Witness: Gary R. Bartlett

Northern Illinois Gas Company d/b/a Nicor Gas Company
Response to: Constellation NewEnergy-Gas Division, LLC
Ill.C.C. Docket No. 08-0363
CNE Second Set of Data Requests

2000

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	November	60,437,407
Hudson	November	10,695,423
Lake Bloomington	November	8,067,518
Lexington	November	7,886,006
Pecatonica	January	979,459
Pontiac Mt Simon	November	4,893,455
Pontiac Galesville	November	8,367,686
Troy Grove	November	45,644,469

2001

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	November	63,056,085
Hudson	November	12,187,316
Lake Bloomington	November	9,007,751
Lexington	November	9,012,081
Pecatonica	September	1,113,521
Pontiac Mt Simon	December	5,722,193
Pontiac Galesville	December	8,608,047
Troy Grove	November	47,560,488

2002

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	October	62,653,023
Hudson	November	11,112,345
Lake Bloomington	November	8,731,570
Lexington	November	8,152,810
Pecatonica	November	1,173,306
Pontiac Mt Simon	November	5,288,041
Pontiac Galesville	November	8,238,441
Troy Grove	October	47,159,026

2003

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	October	62,945,125
Hudson	November	11,200,057
Lake Bloomington	November	8,534,352
Lexington	November	7,847,578
Pecatonica	January	1,173,307
Pontiac Mt Simon	November	5,113,335
Pontiac Galesville	November	8,044,677
Troy Grove	October	47,549,776

2004 (1)

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	October	58,403,490
Hudson	January	8,979,269
Lake Bloomington	November	7,604,067
Lexington	November	7,274,479
Pecatonica	December	1,482,923
Pontiac Mt Simon	January	3,589,186
Pontiac Galesville	November	7,812,625
Troy Grove	October	45,684,743

2005

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	October	59,085,060
Hudson	November	9,136,017
Lake Bloomington	November	7,617,144
Lexington	November	6,850,810
Pecatonica	January	1,521,079
Pontiac Mt Simon	November	3,781,319
Pontiac Galesville	November	7,454,518
Troy Grove	November	43,515,526

2006

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	October	56,819,628
Hudson	November	8,393,645
Lake Bloomington	November	7,663,892
Lexington	November	7,079,473
Pecatonica	January	1,341,333
Pontiac Mt Simon	November	3,533,336
Pontiac Galesville	October	7,970,447
Troy Grove	October	42,200,658

2007

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	November	57,049,377
Hudson	November	8,568,834
Lake Bloomington	November	7,730,614
Lexington	November	6,985,443
Pecatonica	November	1,372,140
Pontiac Mt Simon	December	2,776,801
Pontiac Galesville	October	8,159,694
Troy Grove	October	41,533,335

2008 (2)

Storage Field	Month	Volume (MMBtu)
Ancona/Garfield	January	38,325,132
Hudson	January	5,181,542
Lake Bloomington	January	4,544,654
Lexington	January	4,577,009
Pecatonica	January	1,368,936
Pontiac Mt Simon	January	1,972,087
Pontiac Galesville	January	6,662,916
Troy Grove	January	27,495,961

(1) Reflects top to base net reclass adjustment made in 2004.
SUPPLEMENTAL: Balances reached before September 2004 do not reflect the Sept. 2004 top to base reclassification.
(2) 2008 YTD through June 30, 2008.

Monthly Storage Injection Relative to
Maximum Historical Field Inventory Level

TROY GROVE

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	2%	0%	1%	0%	1%	0%	0%	0%
February	4%	0%	0%	0%	0%	0%	0%	0%
March	4%	1%	0%	7%	1%	1%	0%	2%
April	0%	6%	1%	9%	4%	2%	0%	3%
May	10%	21%	19%	7%	15%	15%	13%	15%
June	18%	18%	22%	17%	15%	17%	16%	15%
July	14%	11%	16%	16%	15%	19%	15%	13%
August	11%	6%	12%	11%	14%	15%	14%	12%
September	11%	12%	9%	10%	12%	11%	13%	15%
October	12%	7%	7%	12%	7%	9%	9%	10%
November	1%	6%	0%	0%	0%	2%	4%	0%
December	0%	0%	1%	0%	1%	1%	1%	0%

ANCONA

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	0%	0%	0%	0%	0%	0%	0%	0%
February	0%	0%	0%	0%	0%	0%	0%	0%
March	1%	0%	0%	0%	0%	0%	0%	0%
April	1%	7%	0%	8%	1%	0%	0%	0%
May	5%	19%	15%	17%	14%	15%	11%	16%
June	16%	15%	17%	16%	15%	16%	16%	15%
July	17%	12%	15%	15%	18%	18%	15%	15%
August	13%	9%	15%	15%	18%	15%	16%	14%
September	13%	10%	14%	12%	16%	15%	15%	15%
October	13%	7%	11%	6%	6%	15%	15%	15%
November	2%	3%	0%	0%	0%	0%	0%	0%
December	0%	2%	0%	0%	0%	0%	0%	0%

PONTIAC/MT. SIMON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	3%	0%	4%	0%	0%	0%	0%	0%
February	2%	0%	0%	0%	0%	0%	0%	0%
March	3%	6%	2%	6%	0%	0%	0%	0%
April	10%	15%	3%	0%	0%	0%	0%	0%
May	1%	13%	14%	2%	0%	0%	0%	0%
June	4%	2%	30%	12%	2%	6%	0%	0%
July	4%	5%	0%	0%	0%	11%	0%	0%
August	10%	3%	7%	0%	0%	9%	0%	0%
September	4%	7%	15%	1%	9%	7%	27%	0%
October	43%	16%	11%	36%	39%	30%	46%	13%
November	18%	31%	22%	37%	36%	35%	19%	40%
December	7%	19%	7%	0%	0%	0%	0%	12%

Monthly Storage Injection Relative to
Maximum Historical Field Inventory Level

PONTIAC/GALESVILLE

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	2%	0%	0%	0%	0%	0%	0%	0%
February	2%	0%	0%	0%	0%	0%	0%	0%
March	3%	4%	1%	2%	0%	0%	0%	0%
April	1%	17%	1%	6%	4%	0%	0%	0%
May	1%	16%	12%	13%	12%	16%	4%	23%
June	13%	13%	15%	14%	15%	14%	1%	13%
July	15%	11%	13%	13%	13%	11%	14%	12%
August	13%	8%	13%	12%	12%	13%	4%	11%
September	13%	12%	14%	12%	11%	12%	7%	13%
October	16%	8%	12%	12%	11%	10%	13%	8%
November	8%	6%	7%	3%	3%	9%	0%	0%
December	2%	4%	0%	0%	0%	0%	0%	0%

LAKE BLOOMINGTON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	0%	2%	0%	0%	0%	0%	0%	0%
February	0%	0%	0%	0%	0%	0%	0%	0%
March	2%	3%	0%	0%	0%	0%	0%	0%
April	4%	5%	0%	0%	0%	0%	0%	0%
May	3%	2%	2%	10%	10%	9%	9%	0%
June	1%	0%	1%	0%	0%	1%	0%	15%
July	5%	0%	12%	0%	0%	1%	0%	0%
August	1%	0%	7%	0%	0%	8%	14%	13%
September	25%	31%	28%	19%	18%	22%	23%	24%
October	27%	28%	31%	28%	27%	25%	24%	26%
November	15%	17%	15%	28%	26%	15%	14%	9%
December	1%	8%	0%	0%	0%	0%	0%	0%

HUDSON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	2%	2%	0%	0%	0%	0%	0%	0%
February	1%	0%	0%	0%	0%	0%	0%	0%
March	0%	1%	0%	0%	0%	0%	0%	0%
April	0%	2%	0%	0%	0%	0%	0%	0%
May	6%	0%	0%	12%	6%	3%	5%	0%
June	2%	0%	0%	2%	9%	11%	12%	10%
July	5%	0%	2%	0%	1%	2%	0%	5%
August	3%	10%	19%	0%	0%	10%	9%	19%
September	17%	22%	24%	17%	19%	17%	17%	19%
October	27%	27%	26%	23%	20%	19%	25%	20%
November	14%	20%	13%	27%	19%	22%	9%	10%
December	0%	0%	0%	0%	0%	0%	0%	0%

Monthly Storage Injection Relative to
Maximum Historical Field Inventory Level

LEXINGTON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	0%	3%	0%	0%	0%	0%	0%	0%
February	0%	0%	0%	0%	0%	0%	0%	0%
March	0%	1%	0%	0%	0%	0%	0%	0%
April	5%	5%	0%	0%	0%	0%	0%	0%
May	0%	1%	1%	3%	0%	0%	4%	0%
June	0%	0%	0%	0%	5%	0%	2%	6%
July	0%	0%	5%	0%	0%	0%	0%	0%
August	0%	0%	3%	0%	0%	0%	0%	1%
September	24%	29%	23%	20%	24%	11%	23%	20%
October	28%	31%	31%	25%	27%	26%	31%	24%
November	16%	14%	20%	26%	21%	29%	10%	13%
December	0%	8%	0%	0%	0%	0%	0%	0%

PECATONICA

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	0%	0%	0%	7%	3%	5%	0%	2%
February	4%	0%	0%	0%	0%	0%	0%	2%
March	0%	0%	0%	4%	0%	2%	0%	0%
April	0%	7%	0%	4%	5%	0%	0%	0%
May	0%	0%	3%	0%	13%	0%	0%	0%
June	0%	8%	4%	4%	6%	14%	0%	0%
July	1%	9%	0%	0%	4%	4%	0%	0%
August	0%	0%	19%	2%	4%	0%	0%	4%
September	0%	1%	13%	3%	2%	6%	0%	14%
October	3%	0%	2%	3%	0%	0%	2%	0%
November	11%	0%	2%	8%	0%	3%	0%	5%
December	3%	0%	0%	0%	4%	0%	0%	0%

TOTAL ALL FIELDS

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	1%	0%	0%	0%	0%	0%	0%	0%
February	2%	0%	0%	0%	0%	0%	0%	0%
March	2%	1%	0%	3%	0%	0%	0%	1%
April	1%	7%	1%	6%	2%	1%	0%	1%
May	6%	16%	13%	11%	12%	13%	10%	13%
June	13%	13%	16%	13%	13%	14%	12%	14%
July	13%	9%	13%	12%	13%	14%	12%	11%
August	10%	7%	13%	11%	13%	13%	12%	12%
September	14%	14%	14%	12%	15%	14%	15%	15%
October	16%	11%	13%	13%	11%	15%	16%	14%
November	5%	7%	4%	6%	5%	6%	4%	3%
December	0%	3%	0%	0%	0%	0%	0%	0%

End of Month Storage Inventory Balance Relative to Maximum Historical Field Capacity

TROY GROVE

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	49%	44%	57%	43%	51%	38%	54%	50%
February	39%	30%	37%	22%	32%	19%	30%	25%
March	35%	21%	18%	21%	17%	6%	11%	15%
April	21%	24%	14%	27%	17%	5%	9%	8%
May	30%	46%	34%	34%	32%	19%	22%	23%
June	49%	63%	56%	50%	-4%	36%	38%	38%
July	63%	74%	71%	66%	58%	54%	52%	50%
August	73%	80%	83%	77%	72%	69%	66%	62%
September	85%	91%	92%	87%	5%	81%	79%	77%
October	95%	96%	96%	99%	95%	90%	88%	87%
November	79%	97%	82%	86%	82%	82%	85%	74%
December	61%	77%	66%	70%	66%	66%	72%	58%

ANCONA

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	55%	50%	66%	49%	52%	41%	50%	47%
February	37%	35%	48%	30%	32%	24%	30%	28%
March	31%	24%	29%	16%	18%	8%	14%	15%
April	22%	30%	18%	23%	14%	2%	5%	4%
May	25%	48%	32%	39%	27%	18%	16%	20%
June	41%	63%	50%	55%	-4%	34%	32%	35%
July	58%	75%	64%	70%	56%	52%	47%	50%
August	71%	84%	79%	86%	74%	67%	63%	64%
September	84%	94%	93%	97%	0%	82%	78%	79%
October	97%	101%	103%	103%	96%	97%	93%	94%
November	87%	98%	89%	91%	83%	86%	84%	82%
December	68%	86%	71%	74%	64%	66%	68%	64%

PONTIAC/MT. SIMON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	77%	79%	90%	85%	77%	27%	24%	28%
February	61%	57%	68%	64%	72%	14%	10%	18%
March	52%	57%	56%	57%	70%	8%	5%	12%
April	59%	69%	52%	51%	49%	4%	3%	9%
May	60%	82%	65%	50%	48%	3%	3%	9%
June	64%	83%	95%	62%	-6%	10%	3%	9%
July	68%	88%	95%	62%	45%	21%	3%	9%
August	78%	90%	103%	63%	45%	30%	3%	9%
September	82%	97%	118%	64%	-48%	37%	30%	9%
October	118%	111%	123%	100%	45%	67%	76%	22%
November	110%	135%	142%	131%	81%	102%	85%	62%
December	86%	131%	125%	96%	55%	62%	50%	54%

Negative values reflect reclassification.

End of Month Storage Inventory Balance Relative to Maximum Historical Field Capacity

PONTIAC/GALESVILLE

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	55%	45%	72%	46%	47%	51%	71%	55%
February	43%	25%	52%	26%	34%	41%	54%	36%
March	41%	24%	28%	19%	18%	12%	52%	27%
April	27%	40%	11%	19%	16%	5%	51%	16%
May	27%	56%	22%	30%	28%	19%	55%	39%
June	38%	67%	37%	43%	-2%	34%	56%	52%
July	53%	78%	50%	56%	53%	44%	70%	64%
August	66%	86%	64%	68%	65%	57%	74%	75%
September	79%	93%	77%	81%	1%	69%	81%	88%
October	95%	97%	90%	93%	89%	79%	94%	96%
November	88%	97%	94%	85%	91%	87%	90%	92%
December	68%	84%	77%	70%	73%	73%	81%	80%

LAKE BLOOMINGTON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	46%	43%	57%	35%	53%	48%	37%	30%
February	30%	30%	35%	24%	32%	27%	19%	17%
March	22%	26%	22%	20%	22%	15%	10%	9%
April	23%	29%	15%	17%	17%	9%	7%	6%
May	26%	31%	13%	26%	27%	18%	17%	5%
June	25%	31%	11%	26%	-11%	19%	17%	21%
July	30%	31%	23%	26%	16%	20%	17%	21%
August	30%	31%	30%	26%	16%	28%	30%	33%
September	55%	62%	58%	46%	4%	50%	53%	57%
October	81%	91%	89%	73%	65%	75%	77%	83%
November	84%	98%	89%	102%	91%	86%	80%	80%
December	61%	86%	61%	77%	72%	61%	55%	55%

HUDSON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	71%	52%	75%	52%	67%	43%	50%	31%
February	56%	42%	58%	39%	48%	26%	33%	14%
March	45%	39%	45%	32%	36%	12%	17%	3%
April	37%	40%	35%	27%	28%	6%	7%	0%
May	42%	40%	31%	39%	32%	7%	10%	0%
June	44%	40%	27%	41%	-11%	18%	22%	10%
July	46%	40%	27%	41%	30%	20%	22%	15%
August	46%	50%	46%	42%	31%	30%	31%	34%
September	63%	72%	70%	59%	-8%	47%	48%	53%
October	90%	99%	96%	82%	62%	67%	72%	73%
November	94%	119%	97%	109%	81%	89%	72%	73%
December	70%	98%	74%	88%	62%	70%	52%	51%

Negative values reflect reclassification.

End of Month Storage Inventory Balance Relative to Maximum Historical Field Capacity

LEXINGTON

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	43%	44%	61%	38%	41%	38%	47%	35%
February	35%	40%	42%	30%	32%	28%	32%	29%
March	27%	35%	30%	24%	25%	21%	24%	29%
April	28%	38%	24%	21%	21%	17%	18%	27%
May	28%	37%	21%	24%	20%	16%	19%	20%
June	28%	36%	17%	24%	-16%	16%	22%	26%
July	28%	36%	22%	24%	10%	16%	22%	26%
August	27%	36%	25%	24%	10%	16%	22%	28%
September	51%	65%	48%	44%	6%	28%	45%	48%
October	79%	97%	79%	69%	67%	54%	75%	72%
November	81%	100%	90%	90%	88%	83%	76%	77%
December	55%	90%	61%	65%	62%	66%	55%	56%

PECATONICA

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	46%	45%	57%	62%	44%	77%	78%	70%
February	49%	42%	47%	50%	36%	66%	73%	69%
March	49%	41%	36%	46%	27%	56%	73%	65%
April	40%	47%	25%	39%	33%	56%	71%	58%
May	40%	47%	28%	39%	45%	56%	71%	58%
June	40%	55%	33%	44%	0%	70%	71%	58%
July	41%	64%	33%	44%	55%	74%	71%	58%
August	41%	64%	52%	46%	59%	74%	71%	62%
September	41%	65%	64%	49%	20%	80%	71%	75%
October	44%	65%	66%	52%	82%	80%	73%	75%
November	49%	65%	68%	60%	82%	82%	73%	80%
December	47%	65%	68%	60%	83%	78%	73%	80%

TOTAL ALL FIELDS

Month	2000	2001	2002	2003	2004	2005	2006	2007
January	54%	48%	64%	47%	53%	41%	51%	46%
February	40%	34%	45%	29%	35%	24%	31%	26%
March	34%	26%	27%	21%	21%	10%	16%	16%
April	24%	31%	19%	25%	18%	5%	10%	8%
May	29%	47%	31%	36%	30%	18%	20%	20%
June	43%	59%	46%	49%	-6%	32%	33%	34%
July	55%	68%	59%	61%	50%	46%	44%	45%
August	65%	75%	72%	71%	62%	59%	57%	57%
September	79%	88%	86%	83%	1%	73%	72%	72%
October	94%	98%	97%	96%	88%	87%	88%	86%
November	85%	100%	89%	91%	84%	85%	83%	78%
December	65%	85%	70%	73%	65%	67%	67%	61%

Negative values reflect reclassification.

CNE-Gas Exhibit 1.7. Daily Injection Limits

Month	Current Daily Injection Limits	Proposed Daily Injection Limits
Nov-Feb	2 * MDCQ	2 * MDCQ
March		150% of historical March usage
April	Comparable month historical usage plus 25% of SBS capacity	110% of historical April usage
May		Comparable month historical usage plus 25% of SBS capacity
June		
July		Comparable month historical usage plus 25% of the difference between SBS capacity minus April 30 SBS inventory
August		
September		
October		

Northern Illinois Gas Company d/b/a Nicor Gas Company
Supplemental Response to: Illinois Commerce Commission
Ill.C.C. Docket No. 08-0363
DAS First Set of Data Requests

DAS 1.01 Q. On page 29, lines 620 through 622 of Nicor Gas Exhibit 4.0, Mr. Bartlett states that "Nicor Gas has had to cap, or limit, pipeline deliveries to its system several times over the last few years in order to protect the operational integrity of its system and storage fields. Often times, these cap periods were several days, even weeks, in length instead of just for a day or a few days." Please provide the date, duration and number of customers, both transportation and sales, affected by these pipeline caps.

DAS 1.01 A. Nicor Gas Pipeline Cap Periods

Date	No. Days
10/08/04 – 10/11/04	4
11/08/05 – 11/14/05	7
12/30/05 - 02/06/06	39
04/14/06 – 05/08/06	25
11/09/06 – 11/10/06	2
11/22/06 – 11/29/06	8
12/14/06 – 01/12/07	30
03/23/07 – 04/11/07	20
04/14/07 – 04/17/07	4

When Pipeline Caps are implemented all customers are subject to the effects of the pipeline caps.

SUPPLEMENTAL RESPONSE:
This response corrects an error to the first line of the above table. The original response incorrectly indicated that the duration was 35 days rather than 4 days.

Witness: Gary R. Bartlett

CNE-Gas Ex. 1.9. July-Oct Daily Injection Limits Example

	Current	**Proposed**	
	Comparable month historical usage plus 25% of SBS capacity	Comparable month historical usage plus 25% of the difference between SBS capacity minus April 30 SBS inventory	
SBS Capacity	1,000	1,000	
25% of SBS Capacity	250	April 30 Inventory of:	25% of difference is:
		900	25
		800	50
		700	75
		600	100
		500	125
		400	150
		300	175
		200	200
		100	225
		0	250

VERIFICATION BY CERTIFICATION

Under penalties as provided by law, Darcy A. Fabrizius, Manager of Regulatory Affairs for Constellation NewEnergy – Gas Division, LLC, deposes and states that she has personal knowledge of all the facts contained in the foregoing *Direct Testimony of Darcy A. Fabrizius*, and that the testimony is true and correct to the best of her knowledge.

Darcy A. Fabrizius

Darcy A. Fabrizius

Subscribed and Sworn to before me
this 26th day of August, 2008

Notary Public

My commission expires: 1/24/2010

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